

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-8086

CLIFFSTAR FOODS CORPORATION

INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. 8086. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to City of Walla Walla municipal sewer system. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix C—Response to Comments.

GENERAL INFORMATION	
Applicant	Cliffstar Corporation
Facility Address	1164 Dell Avenue Walla Walla, WA 99362
Type of Facility:	Fruit Juice Processing
Facility Discharge Location	Latitude: 46° 4' 16.5" N Longitude: 118° 21' 33" W
Treatment Plant Receiving Discharge	City of Walla Walla
Contact at Facility	Name: Shannon McFall Telephone #: (509) 522-8608
Responsible Official	Name: Shannon McFall Title: Plant Manager Address: -same as above- Telephone #: (509) 522-8608 FAX #: (509) 522-8613

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BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Cliffstar Corporation operates a juice processing facility located in Walla Walla. Juice concentrates are blended with water, sugar, and other ingredients; then repackaged for resale. Wastewaters from the operations are discharged to the City of Walla Walla municipal sewer system. This facility is a significant industrial user based on the volume of discharge (greater than 25,000 gpd) and organic loading (greater than 5% of the organic capacity of the POTW treatment plant). The facility is not subject to categorical pretreatment effluent limitations.

HISTORY

The facility began operation in early 2003 at the former location of Agri-Frozen Foods vegetable processing plant in Walla Walla (see Figure 1).

INDUSTRIAL PROCESSES

Juice concentrates (apple, grape, cranberry, strawberry, raspberry, peach, and pear) are received in bulk at the facility and then transferred into storage tanks. From the tanks, concentrates are blended with water, sugar, and other ingredients, pasteurized, filled into plastic containers, labeled, cased and palletized for shipment to retail markets. Other ingredients added to the juices include enhancers (vitamin C and calcium), preservatives (sodium benzoate, citric acid and maltic acid), and flavorings.

Sources of wastewater include juice overflow, water from bottle cooling, boiler blowdown, and clean-in-place sanitation of processing equipment. An alkaline based cleaner is used as a sanitizing chemical. Figure 2 shows a flow diagram for the operations.

TREATMENT PROCESSES

Inside the processing plant, wastewaters are routed through a concrete floor drain system. The wastewater flows through the floor drains to the outside of the building, across a paved parking area, and into a concrete sump in an enclosed building. This building had previously housed the wastewater screening equipment for the vegetable processing plant. The wastewater flows out of the basin, into an effluent monitoring station, then into the City municipal sewer system. The monitoring station contains a palmer bowlus flume and continuous flow monitoring equipment. The wastewater collection system also receives stormwater from the facility's roof drains and parking lot.

Cliffstar submitted an engineering report for their proposed operations on November 3, 2002. The engineering report projected an effluent flow of 36,000 to 50,000 gpd, with effluent BOD and TSS of up to 350 mg/L and 50 mg/L, respectively.

Wastewater monitoring has shown much higher flows and BOD concentrations than listed in the facility's SWD application and engineering report. Since operations began, OMI, Inc (the company contracted to operate the City's wastewater treatment plant) has been sampling the discharge on a quarterly basis. Effluent pH has been typically outside of the range set by the existing local sewer ordinance (within the range 5.0 to 11.0 s.u.). The City of Walla Walla is presently updating their local sewer ordinance. The proposed local limits for pH are within the range 5.5 to 9.5 s.u.

The Department's ERO WQ enforcement specialist visited the site on June 23, 2004 to discuss the low effluent pH discharged from the facility. As a result of the visit, the company installed a sodium hydroxide (caustic) metering system for pH adjustment. The effluent pH was checked and caustic was manually added to control pH. However, this system was not effective at meeting pH discharge standards.

The facility has since added an automated pH adjustment system. Caustic is metered into the effluent, upstream of the final effluent monitoring station. There has been no recent effluent sampling to verify that the new system is meeting the pH local limits.

PERMIT STATUS

An application for a permit was submitted to the Department on November 11, 2002 and accepted by the Department on December 4, 2002. A temporary permit became effective on February 28, 2003. In September, 2005, the Department requested that the Permittee update their application to reflect current flows and loadings from the facility.

The City of Walla Walla has applied to the Department for delegation under the National Pretreatment Program. Once this delegation occurs, the City would become the permitting authority for discharges to their sewer system. This delegation is expected within this permit cycle.

SUMMARY OF COMPLIANCE

The facility last received an inspection on April 28, 2005. The facility has not been meeting local limits for pH as described above.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in sampling done by OMI, Inc. The proposed wastewater discharge is characterized for the following parameters (see Table 1 for complete results):

Parameter	Min	Avg	Max	#samples¹
Flow, gpd	6,762	27,331	59,949	10
pH, s.u.	3.3	5.0	10.1	25
BOD, mg/L	442	2,512	7,633	15
BOD, lbs/day	36	522	1,276	10
TSS, mg/L	26	172	632	14
TSS, lbs/day	4	32	106	10

¹From February, 2003 to May, 2005

The low effluent pH values are the result of the acidity of juice concentrate processed at the facility. Effluent flow has exceeded those listed in the SWD permit application (18,750 gpd), and those estimated in the engineering report (36,000 to 50,000 gpd). However, effluent BOD and TSS have exceeded those in both the application and engineering report.

The BOD loading from the facility has exceeded 5% of the BOD influent design loading of the City of Walla Walla POTW three times during the monitoring period, as shown below. Exceeding 5% of the receiving POTW design hydraulic or organic loading is one condition for determining whether a discharger is a significant industrial user.

Date	BOD, lbs/day	% of POTW Influent BOD	
		Design Criteria ¹	Monthly Maximum ²
6/3/03	1,276	11.8%	12.6% (10,156 lbs/day)
7/1/03	1,010	9.3%	13.2% (7,652 lbs/day)
1/7/05	1,064	9.8%	12.3% (8,620 lbs/day)

¹Maximum monthly BOD influent design loading is 10,815 lbs/day

²Corresponding maximum monthly BOD influent loadings to the POTW were 10,156 lbs/day for June, 2003; 7,652 lbs/day for July, 2003, and 8,620 lbs/day (measured as carbonaceous BOD) for January, 2005

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The minimum requirements to demonstrate compliance with the AKART standard and specific design criteria for this facility were estimated in the engineering report (Esvelt Engineering, 2003). This included an effluent flow of 36,000 to 50,000 gpd. However, the actual maximum daily discharge exceeds these values. The current application lists an effluent flow of 18,750 gpd. This limit will be included in the proposed permit.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). There are no federal categorical limitations for this facility under 40 CFR Part 405-471. There are federal categorical limitations for the Canned and Preserved Fruits and Vegetables Processing Point Source Category in 40 CFR Part 407. However, these standards are applicable to facilities that process raw fruit into finished products, not facilities processing fruit concentrates into bottled juices.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the City of Walla Walla municipal sewer collection and treatment system from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by City of Walla Walla and codified in ordinance. Currently, the City of Walla Walla is updating its local

sewer ordinance, including local limits. The following table compares the current and proposed local limits for parameters of concern (BOD, TSS, flow, pH, and temperature):

Summary of Local Limits		
Parameter	Existing Local Limits¹	Proposed Local Limits
BOD ₅	-	250 mg/l
TSS	-	250 mg/l
Flow	-	No Limit Required
pH	5.0 to 11.0 s.u.	5.5 to 9.5 s.u.
Temperature	104 °F (Plant Headworks) 140 °F	104 °F (Plant Headworks) 150 °F (Point of Discharge into Sewer System)

¹City of Walla Walla Municipal Code, Chapter 13.30, Wastewater Standards

The proposed permit will not contain limitations for either BOD or TSS. However, limitations for these parameters will likely be necessary after the proposed sewer ordinance is finalized. The proposed permit does include the proposed local limitations for pH (within the range 5.5 to 9.5) and temperature (150 °F).

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S2 and S3. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment. The proposed permit requires submission of an updated O&M manual for the entire wastewater system.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of raw materials and chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The proposed permit requires the Permittee to develop and implement a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs.

SLUG DISCHARGE CONTROL PLAN

There are floor drains throughout the processing area, including areas where juice concentrate is stored. Therefore, the Permittee has the potential for a batch discharge or a spill that could adversely effect the POTW. A slug discharge control plan is required to address the potential spill of material into the POTW collection system (40 CFR 403.8 (f)).

COMPLIANCE SCHEDULE FOR INSTALLATION OF CONTINUOUS PH RECORDING

The proposed permit will require continuous pH recording. Since the Permittee does not have continuous pH recording, the proposed permit will contain a compliance schedule for the installation of the continuous pH recording equipment.

ENGINEERING REPORT FOR SEPARATION OF STORMWATER FROM PROCESS WASTEWATER/COLLECTION SYSTEM CORROSION ANALYSES

As explained previously, the facility's stormwater from both roof drains and parking lot areas are directed to the process wastewater system. Stormwater discharges are prohibited from being discharged into a municipal sewage system by WAC 173-216(2)(vii), except under extraordinary circumstances. The proposed permit requires an engineering report for the separation of stormwater from the process wastewater collection systems.

Additionally, the facility's collection system of floor drains, trenches, and sumps are concrete. During the April, 2005 inspection, an accumulation of sand & grit in the throat of the effluent flume was observed. This potentially could be aggregate being lost from the concrete floor drains and sumps (corrosion of concrete can occur when exposed to low pH wastewater). Therefore, the proposed permit will also require that an engineering report examines the collection system for signs of corrosion, and requires measures to prevent any significant corrosion.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for 5 years.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology.

Laws and Regulations(<http://www.ecy.wa.gov/laws-rules/index.html>)

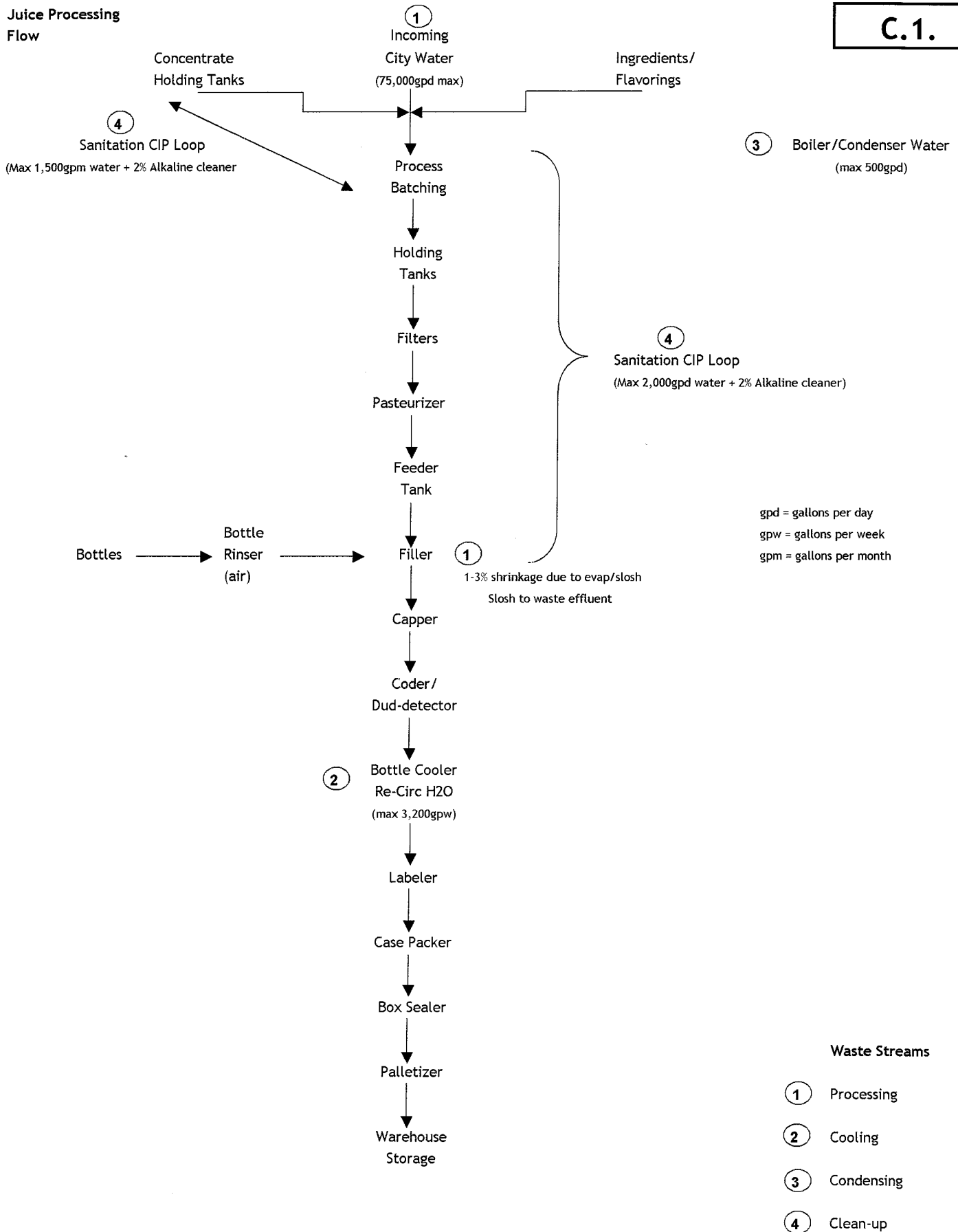
Permit and Wastewater Related Information
(<http://www.ecy.wa.gov/programs/wq/wastewater/index.html>)



Figure 1. Site Location

**Juice Processing
Flow**

C.1.



Note: No Waste Water Treatment Devices

Figure 2 - Process Flow Diagram

Table 1 - Cliffstar of Walla Walla - Sampling Results by OMI, Inc.

Date	Type of Sample	pH (s.u.)	Temp (°C)	TSS (mg/L)	BOD (mg/L)	Flow (gpd)
2/3/03	grab	5.5	-	-	-	-
2/3/03	composite	10.12	-	30	442	-
3/12/03	composite	4.28	-	84.5	>2,300	-
3/24/03	composite	4.01	-	26	1,467	17,230
4/3/03	composite	9.43	-	87.2	2,192	17,385
5/6/03	composite	4.57	-	184	498	19,121
5/7/03	grab	4.13	18.8	-	2,300	-
6/3/03	grab	3.31	30.4	-	-	-
6/3/03	composite	4.03	-	632	7,633	20,051
7/1/03	grab	3.28	-	-	-	-
7/1/03	composite	3.51	-	382	5,752	21,056
10/2/03	grab	6.15	-	-	-	-
10/2/03	composite	4.33	-	182	1,980	32,179
2/4/04	grab	5.2	-	-	-	-
2/3/04	composite	-	-	48	>383	59,949
4/14/04	grab	3.47	-	-	-	-
4/13/04	composite	-	-	238	3,010	-
7/15/04	grab	4.76	-	-	-	-
7/15/04	composite	-	-	366	3,363	191,090
10/19/04	composite	6.91	-	36	633	33,139
10/19/04	grab	8.54	-	-	-	-
11/16/04	grab	3.95	-	-	-	-
11/18/04	grab	6.45	-	-	-	-
1/6/05	grab	3.25	-	-	-	-
1/7/05	grab	3.7	-	-	-	-
1/7/05	composite	3.56	-	41	2747.5	46,439
4/21/05	composite	5.23	-	74.5	632.5	6,762
5/3/05	grab	4.01	22	-	-	-

Min		3.3	18.8	26	442	6,762
Avg		5.0	23.7	172	2,512	42,218
Max		10.1	30.4	632	7,633	191,090
#samples		25	3	14	15	11

	City of Walla Walla Local Limits:				Permit Application:
	Min	5.0	-	-	-
	Avg	-	-	-	-
	Max	11.0	60°C (140°F)	-	18,750

APPENDICIES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on February 26 and March 5, 2003 in the Walla Walla Union-Bulletin to inform the public that an application had been submitted and to invite comment on the issuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on December 7, 2005 in the Walla Walla Union-Bulletin to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205-1295

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (509) 329-3400, or by writing to the address listed above.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring—Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued there under (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantification Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

- 1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C—RESPONSE TO COMMENTS

The Department did not receive any comments on the proposed permit.